Social Media Policy

Prepared by:	Director of HR in consultation with whole school staff and city-wide unions
Applies to:	All individuals having access to WHMAT's electronic communications system and/or to social media channels
Approved by:	WHMAT Board of Trustees 18.10.18
Issued to WHMAT Academies for use:	25.10.2018
Annual review date:	24 months from ratification by Board of Trustees
Links to:	WHMAT's Grievance Policy WHMAT's Dignity at Work Policy WHMAT's Disciplinary Policy & Procedure WHMAT's Equal Opportunities Policy WHMAT's Employee Code of Conduct WHMAT's GDPR Compliant Data Protection Policy WHMAT's Safeguarding & Child Protection Policy
Version:	Version 6 25.10.2018

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1.   Commitment & Purpose

1.1   Washwood Heath Multi Academy Trust (WHMAT) recognises that social media and social networking technologies can serve as a powerful tool to enhance education, communication and learning for all pupils, staff members and board trustees. It recognises that when used correctly, social media and social networking can provide both educational and professional benefits. However, it also recognises that individuals' use of social media can pose risks to our ability to safeguard our pupils, to protect confidential information and our reputation. It can also jeopardise our compliance with legal obligations.   Those using social media are also potentially at risk of offending others,   and/or blurring professional boundaries.

1.2   The purpose of this policy is therefore to reduce the risks at 1.1 above by:

      1.2.1   creating a framework for acceptable use of social media, both within the workplace and outside of the workplace;

      1.2.2   clarifying the responsibilities of staff members & other relevant users (see 2.1 & 2.2 below); and

      1.2.3   setting out the possible implications of not following this policy.

2.   Scope

2.1   This policy applies to all WHMAT staff members regardless of contract type, grade or seniority.

2.2   It also applies to members, trustees, members of academy advisory boards, consultants, contractors, agency staff and volunteers, who may have access to and use of our electronic communication systems and equipment or have access to social media. These individuals are collectively referred to as "staff members" in this policy.

2.3   The policy relates to staff members' use of social media (see definition at 3 below) inside and outside of work e.g. on WHMAT premises and in their own time. It applies to the use of social media for both business and personal purposes, during work hours or otherwise and applies regardless of whether social media is accessed using WHMAT devices or personal equipment belonging to WHMAT staff members. It does not form part of staff members' contracts of employment, and WHMAT reserves the right to amend it at any time following consultation. E-mail usage is covered under WHMAT's e-safety policy (see www.washwoodmat, policies tab).

2.4   References in this Policy to the CEO of WHMAT, also include the Deputy CEO.

3.   What is social media

3.1   WHMAT defines "social media" as any online communication channels that allow users to create and share content and/or to take part in online networking. The most popular sites

currently include the following (but this policy covers all social media):

    3.1.1   Facebook
    3.1.2   WhatsApp
    3.1.3   Twitter
    3.1.4   LinkedIn
    3.1.5   YouTube
    3.1.6   Google+
    3.1.7   Instagram
    3.1.8   Pinterest
    3.1.9   Flickr.
    3.1.10 Tumblr
    3.1.11 Reddit.

3.2   Social media may also include photographic and file sharing apps and all other examples of internet posting and blogging sites, including online forums and notice boards. The principles in this policy must be followed regardless of the medium used by staff members. Social media usage may be work-related e.g. a base academy Facebook or Twitter account, or personal/non-work-related e.g. a personal Facebook or Twitter account.

4.0   Roles & Responsibilities

4.1   The Board of Trustees & CEO will:

    4.1.1   Ensure that they have read and understood this policy and that it is reviewed and updated as necessary in consultation with the Director of HR every 2 years from ratification.

    4.1.2   Ensure that they set a culture of responsible social media use by adhering to the principles of this Policy at all times and using social media in a safe and responsible way.

4.2   Heads of Academy will:

    4.2.1   Have overall responsibility for social media sites and publications being used for work purposes within base academies, although the day-to-day management may be delegated to an appropriate member of IT Support.

    4.2.2   Ensure that all staff read this policy by asking them to read it and sign to confirm that they have done so.

    4.2.3   Ensure that prompt action is taken in the event that suspected policy breaches occur.

4.3   HR will:

    4.3.1   Ensure that WHMAT SLT members are trained on this Policy and that SLT cascade the training to all staff.

4.3.2 Ensure that this Policy forms part of staff induction and that new starters sign to confirm that they have read it.

4.3.3 Support Heads of Academy and/or CEO with suspected breaches of this policy as appropriate.

4.4 ICT Support will:

4.4.1 Inform Heads of Academy if any staff members request use of new social media sites.

4.4.2 Ensure filtering & monitoring solutions are fit for purpose and that monitoring of social media usage is carried out in compliance with this policy.

4.4.3 Promptly inform the Head of Academy, or appropriate safeguarding lead if any concerning social media usage comes to light.

4.5 Staff members will:

4.5.1 Read and follow this policy.

4.5.2 Attend training on the policy as directed, unless there are exceptional circumstances.

4.5.3 Promptly report any alleged misuse of social media channels by staff or pupils to the Head of Academy (CEO for head office staff).

5. Personal Social Media Usage

General principles

5.1 WHMAT recognises that many staff members make use of social media in a personal capacity e.g. through Facebook or WhatsApp groups set up in their own name. However, staff members should exercise caution and common sense when using personal social media sites as they are personally responsible for what they decide to post online. While they are not acting on behalf of WHMAT, employees must be aware that they can, through their actions on, or misuse of social media channels, damage WHMAT's reputation if they are recognised as being one of its staff members. If staff members are uncertain or concerned about the appropriateness of any statement or posting, they should not make the post or remove themselves from relevant groups.

Personal usage during work hours

5.2 Employees are not allowed to access social media for personal use from WHMAT/base academy computers or devices at any time, except for the occasional professional use of LinkedIn. This includes work tablets, I-Macs, laptops etc.

5.3   WHMAT understands that employees may occasionally wish to use their own devices e.g. personal mobiles to access personal social media while they are at work. Employees must limit their use of social media on their own equipment to their official rest breaks such as their lunch break or non-contact time. Excessive use which is found to interfere with productivity levels may be subject to disciplinary action.

Contact with pupils

5.4   Staff members must not have any contact with pupils through personal social media channels, unless the pupils are close friends or family members outside of work. This is because this may constitute a conflict of interest or call into question their objectivity. This includes declining "friend requests" from pupils or parents that they receive via personal social media channels. Staff members should notify their Designated Safeguarding Lead of any such requests received. It also means not attempting to proactively make contact with pupils.

Contact with parents

5.5   Staff should not use personal social media to contact a parent in relation to a pupil. However, staff members who use or anticipate using social media to contact parents of pupils, who are personal friends or relatives, should notify HR using the form at Appendix 1. Any staff members who do use social media in this way should complete this form immediately. Staff should be mindful of the contact they have with parents through personal social media for the reasons set out at 5.8

References to work or workplace

5.6   Staff members may state via personal social media that they are WHMAT or base academy staff members. In addition, the Board of Trustees recognises that staff may sometimes want to discuss their work on social media. However, the staff members' online profile (for example, the name of a blog or a Twitter name) must not contain WHMAT's name or that of a base academy within WHMAT.

5.7   If staff members do discuss their work on personal social media (for example, giving opinions on their specialism or the education sector), they must include on their profile a statement/disclaimer along the following lines: "The views I express here are mine alone and do not necessarily reflect the views of my employer."

Communications

5.8   Any communications that employees make in a personal capacity through social media must not:

5.8.1   bring WHMAT into disrepute, for example (this list is not exhaustive) by:

- criticising or arguing with stakeholders, colleagues or parents;
- making defamatory comments about individuals or other organisations or groups; or
- posting images that are inappropriate, offensive or discriminatory or links to inappropriate content;
- doing anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age; using social media to bully another individual (such as an employee of the organisation);
- expressing any work frustrations that they may have on social media sites.

5.8.2.   breach confidentiality, for example (this list is not exhaustive) by:

- revealing sensitive or personal information about WHMAT or a WHMAT colleague or pupil;
- giving away confidential information about an individual (such as a pupil, colleague or supplier, trustee or academy advisory board member member) or organisation (such as a rival MAT); or
- discussing WHMAT's internal workings (such as contracts that it is negotiating or entering into, or details about its future growth plans or about private and confidential staffing matters that have not been communicated to wider staff or to the public);

5.8.3   breach copyright, for example by:

- using someone else's images or written content without permission;
- failing to give acknowledgement where permission has been given to reproduce something.

WHMAT/Base Academy Logos or Brands

5.9   WHMAT or academy logos or brands must not be published on personal web space and staff members should not make representations that their personal social media sites represent WHMAT or base academy views.

Security Settings

5.10   Staff members must use appropriate security settings on social media sites in order to mitigate any potential issues. Staff members are advised to set the privacy levels of their personal web sites as strictly as they can and to opt out of public listings on social networking

sites to protect their own privacy. Staff members should keep their passwords confidential, change them often and be careful about what is posted online; it is not safe to reveal home addresses, telephone numbers and other personal information. It is a good idea to use separate email addresses just for social networking so that any other contact details are not given away.

Pupil Images/Videos

5.11   Photographs, videos or any other types of digital images, which may only be taken on official WHMAT cameras or devices depicting pupils wearing uniforms or clothing with school logos or images identifying school premises must not be published on staff personal social media platforms.

Tagging Pupils or Staff

5.12   Staff members should not "tag" WHMAT or base academy pupils on personal social media channels, or identify their locations on residential school trips. Staff members should only tag fellow colleagues with their express permission, unless they are family members or close family friends.

Grievances/Complaints/Frustrations

5.13   Staff members should not air grievances, complaints or frustrations about WHMAT, base academies, pupils or its colleagues or stakeholders on social media. Concerns should be raised informally first through the appropriate channels and if informal resolution is not possible, they should use internal policies such as grievance, dignity at work or complaints policies as appropriate (see www.washwoodmat, policies tab).

6.   Professional Social Media Usage

6.1   WHMAT defines professional social media usage as "any form of social media used to comment on, support or promote work-related activities."

6.2   Staff members who decide to engage in professional social media activities should maintain a separate professional email address, linked to WHMAT. As such, employees should not use their personal e-mail address for professional social media activities; rather, they should use a professional e-mail address that is completely separate from any personal social media they maintain e.g. a base academy twitter or facebook account.

6.3   Staff should treat professional social media space and communication like a classroom and/or a professional workplace. The same standards expected in professional settings and security is expected on professional social media sites.   If a particular type of behaviour is

inappropriate in the classroom or a professional workplace, then that behaviour is also inappropriate on the professional social media site.

6.4   Staff should exercise caution, sound judgment, and common sense when using professional social media sites. When establishing professional social media sites, staff should consider the intended audience for the site.

6.5   Staff must also set the highest level of privacy/security assigned to the site; specifically whether the site should be a private network (e.g. it is limited to a particular class or particular key stage within the base academy) or a public network (e.g. anyone within the base academy or a larger group). It is recommended practice for professional social media sites to be private networks, unless there is a specific educational need for the site to be a public network.

6.6   Staff should obtain Academy Head approval before setting up a professional social media presence (CEO for Head Office staff).

6.7   Academy Heads are responsible for ensuring that a list of all professional social media accounts within the Academy is available on request.

6.8   Professional social media sites should include language identifying the sites as professional social media sites to differentiate them from personal sites.

6.9   Professional social media communication must remain legal. Confidential information must not be disclosed and prohibitions must be placed on the use of harassing, obscene, discriminatory, defamatory or threatening language.

6.10   If images of students are to be posted online, prior pupil or parental consent must have been sought beforehand via the appropriate consent form. It is not recommended that staff post photos of colleagues on professional social media sites without prior permission of all colleagues in the photos. Photos should be taken on school sanctioned cameras or video devices only and should remain within the appropriate base academy unless there are exceptional circumstances.

6.11   Staff are responsible for monitoring and providing feedback regarding their work-related professional social media sites on request from their Head of Academy. The monitoring responsibilities of each staff member include reviewing the professional social media sites on a regular basis.

6.12   Staff who are required to speak on behalf of WHMAT in a social media environment, must still seek approval for such communication from their Head of Academy, who may provide further training and impose certain requirements and restrictions with regard to these activities. Likewise, if staff are contacted for comments about WHMAT for publication anywhere, including in any social media outlet, should direct the inquiry to the CEO and not respond without prior approval.

7.   Data Protection

Staff should ensure that personal and/or sensitive data is compliant with WHMAT's GDPR/Data protection policy (see www.washwoodmat, policies tab).

8.   Policy Breaches

8.1   A breach of this policy may result in disciplinary action up to and including dismissal. Action may be taken regardless of whether the breach is committed during work hours or not and regardless of whether WHMAT or personal facilities are used when the breach takes place.

8.2   Should there be a potential breach of this policy, suspected employees will be required to fully support the investigation.

8.3   Employees may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may itself result in disciplinary action in line with WHMAT's Disciplinary Procedure. In addition, employees may face legal proceedings if comments that they post about WHMAT or named individuals are found to have harmed their reputation or caused harassment.

9.   Monitoring

9.1   The contents of base academy/WHMAT IT Resources and communications systems are WHMAT property.

9.2   Employees' use of social media using WHMAT systems may be monitored to ensure that they are complying with this policy. By using WHMAT's IT resources and systems, WHMAT employees are consenting to this monitoring.   Therefore, employees should have no expectation of privacy in any messages, files, data, documents, phone calls, social media posts or conversations transmitted to, received or printed from, or stored or recorded on WHMAT's electronic information and communications systems.

9.3   WHMAT may store copies of data or communications used for monitoring purposes for a period of time, after which they will be safely deleted or destroyed in line with our WHMAT Data Retention Policy. Users of base academy/WHMAT owned equipment should therefore have no expectation of privacy in anything they create, send, post or receive using the IT system.

10.   Use of social media in the recruitment process

10.1   WHMAT HR and/or managers will not carry out routine checking of prospective employees' online social media activities, as conducting these searches during the selection process might lead to a presumption that an applicant's protected characteristics (for example, sexual orientation or religious beliefs) played a part in a recruitment decision. However, this may be carried out to verify an applicant's skills, aptitudes or experience for the role e.g. via a professional social media channel such as Linkedin.

11.   Respecting intellectual property and confidential information

11.1   Staff should not do anything to jeopardise base academy confidential information and intellectual property through the use of social media, either professional or personal.

11.2   In addition, staff should avoid misappropriating or infringing the intellectual property of other companies and individuals, which can create liability for WHMAT.

11.3   To protect themselves and WHMAT against liability for copyright infringement, where appropriate, staff members should reference sources of particular information they post or upload and cite them accurately. Staff who have any questions about whether a particular post or upload might violate anyone's copyright or trademark, should seek advice from the Director of HR in the first instance.

12   Policy Review

12.1   This policy will be reviewed by the Director of HR every 24 months from ratification.

APPENDIX 1

Form for notifying the Academy (CEO for head office staff) of contact with parents of a pupil through personal social media channels (see 5.5 of Policy).

 Insert Academy Letterhead

Name	
Job Title	
Base Academy	
Name of Pupil (whose parents you are in contact with via personal social media)	
Name of Parent(s) who you are in contact with via personal social media	
This parent is a personal friend	YES NO
This parent is a family member	YES NO
I confirm I have read and understood WHMAT's Social Media Policy	
Signed	
Dated	

This form, once complete, will be maintained securely by HR on your file.